

EXHIBIT B

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act

Statement and other information before completing this form.

Charge Presented To:

Agency(ies) Charge No(s):

EEOC

523-2022-02147

FEPA

Rhode Island Commission For Human Rights

and EEOC

State or local Agency, if any

Name (indicate Mr., Ms., Mrs.)

Alison McDaniel

Home Phone

917-601-4148

Year of Birth

Street Address

10578 High Hollows Dr Apt 266

DALLAS, TX 75230

Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)

Name

THE PRESERVE SPORTING CLUB

No. Employees, Members

Phone No.

Street Address

87 KINGSTOWN RD

WYOMING, RI 02898

Name

No. Employees, Members

Phone No.

Street Address

DISCRIMINATION BASED ON

Sex

DATE(S) DISCRIMINATION TOOK PLACE

Earliest

03/6/2019

Latest

12/18/2021

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

I was employed with the above-named Respondent since 2019, until I was forced to resign (Constructive Discharge) in February 2022. I was hired as an independent contractor, but Respondent had full control of the means and manner of my work performance. While employed by Respondent, I was subjected to a hostile work environment based on my sex, Female, by Mr. Paul Mihailides (Owner). Mr. Mihailides subjected me to unwelcome sexual advances, request for sexual favors, sexual assault on multiple occasions, ogling with suggestive overtones, verbal, and physical harassment of sexual nature. Please note, the sexual harassment began in 2019 until my forced resignation.

Below, is a list of incidents I documented while employed by Respondent. Be mindful, this list is not a full representation of what I was subjected to but a glimpse.

05/31/2021- Mr. Mihailides told guests I was his mistress. Also, he tried to kiss me multiple times in the mouth, and he talked about my body.

08/01/2021- Mr. Mihailides told me, "I would have sex with your dead body as long as it wasn't cold yet."

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

12/9/22 Alison McDaniel

Date

Charging Party Signature

NOTARY - When necessary for State and Local Agency Requirements

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(month, day, year)

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08/06/2021- While in front of Ocean House President and Managing Director, Mr. Dant Hirsch, and videographer, Mr. Robert Button, Mr. Mihailides talked about my body and what he wanted to do to me.

08/10/2021- Mr. Mihailides told me that my lips were so juicy, and he could only imagine what they could do. Later, I was told by another employee that Mr. Mihailides told people that he was having sex with me.

08/11/2021- Mr. Mihailides told me that everyone wanted to have sex with me and insinuated that he told others that we had sex. This was false.

09/14/2021- Mr. Mihailides told me that he loved me and tried to kiss me in the mouth.

09/15/2021-Mr. Mihailides tried to tell me about a sexual encounter he had with his mistress.

09/25/2021- Mr. Mihailides told me that he could make my life easier if I just gave him what he wanted, kisses. He said this while I was trying to get my paycheck.

10/09/2021- Mr. Mihailides tried to kiss me in the mouth multiple times. He told me that he was a good lover and if I wasn't such a prude my life could get a lot better. Later, he insinuated to a guest that I was his mistress.

10/10/2021- Mr. Mihailides asked me if I was on my period because my breast looked big (while staring at me).

12/18/2021- Mr. Mihailides told me, "This will go better for you if you just give me what I want. Give me a little, get a lot." Also, he tried to kiss me in the mouth.

I believe I am not the only one subjected to sexual harassment by Mr. Mihailides. In addition, I am still owed wages by Respondent.

I believe I have been discriminated against due to my sex, Female, in violation of Title VII of the Civil Rights Act of 1964, as amended and all applicable State statutes.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

12/19/22 *Austin McDaniel*

Date

Charging Party Signature

NOTARY - When necessary for State and Local Agency Requirements

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.
SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(month, day, year)